

February 28, 2006

Minerals Management Service
Attn: Rules Processing Team [RPT]
381 Elden Street
MS-40-24
Herndon, Virginia 20170-4817

Re: RIN 1010-AD30, Alternate Energy-Related Uses on the Outer Continental Shelf

To Whom It May Concern:

This letter is to provide formal comments in response to the MMS December 30, 2005 Advance Notice of Proposed Rulemaking (ANPR) Federal Register Notice pursuant to RIN 1010-AD30 on Alternate Energy-Related Uses on the Outer Continental Shelf.

On behalf of Greenpeace, we appreciate this opportunity to provide these comments. Greenpeace supports the responsible development of domestic renewable energy resources in a manner which fully protects marine life and economic sectors reliant on a healthy ocean ecosystems, subject to all existing federal and state laws.

We believe that the development of offshore wind, particularly in the East Coast, is not only compatible with protecting our oceans and coasts, but necessary for solving the largest threat to these resources, global warming. Greenpeace has supported the development of offshore wind projects in Europe and our experience in Europe gives us confidence that offshore wind farms can be developed successfully in the United States.

We encourage you to look to models in Europe, particularly in the UK, and stay focused on developing a system that will promote the development of this vital resource, while at the same time protecting marine resources. The key to achieving these goals is to find the appropriate balance between marine resources and renewable energy development. Greenpeace encourages MMS and to proactively work with other federal agencies, the states, and local governments to direct projects to the best sites with the dual goal of lower permitting costs and encouraging development in appropriate places. At the same time MMS should fairly evaluate the handful of projects that will be brought to MMS before a more proactive collaborative can be established.

Offshore renewable energy projects will not be developed on the OCS if MMS imposes significant regulatory hurdles that increase costs or delay the permitting process, beyond those inherent to planning, construction, and operation of cutting-edge technology in a highly challenging physical environment.

These offshore projects, particularly offshore wind farms, are extremely important to the success of state renewable energy standards and the Northeast Regional Greenhouse Gas Initiative. MMS should work with the States to ensure that projects are brought forward that help the States achieve the goals they have sent.

Below are some more specific suggestions:

1. MMS should set pre-qualification standards and serve as a useful means to screen applicants and reduce redundancy in administrative procedures and make access for resource and site assessment as simple and efficient as possible. MMS should set reasonable hurdles for developers that ensure that parties seeking access are serious and financially viable. The public resources of the OCS should be protected from purely speculative operators and the ability to complete projects should be considered.

2. Some fiscal encouragement, carefully designed to phase out as the technology gains fiscal viability, is justified initially by the fledgling nature of offshore renewable energy installations. But the agency is responsible for ensuring full fair market value to the public. It is likely that in the near future offshore projects could provide important energy and tax revenues to the public, and MMS should focus on ensuring that the industry reaches the point where it is providing the benefits to society that these technologies promise.

3. A full site-specific EIS should be prepared for each project pursuant to NEPA.

4. MMS should work to include some process for developing adaptive mitigation measures after construction. The scope of the potential measures should be outlined and negotiated with potential developers, and MMS should be careful to balance the desire to maximize the environmental benefits of projects with the needs of developers to limit liability, and ensure that projects can be financed.

5. Program development should be targeted to specific regions, most likely in the North East and Mid Atlantic region, based on relative sensitivity of the marine resources, the availability of alternative renewable resources, and the potential for offshore renewable energy production.

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